

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Seth A. Goldberg, Esq,**  
**DUANE MORRIS LLP**  
**30 South 17th Street**  
**Philadelphia, Pennsylvania 19103**  
*Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc.,  
Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Hai Wang, President of Solco Healthcare US, LLC, on February 9 and 10, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Duane Morris LLP, 30 South 17th St, Philadelphia, Pennsylvania 19103, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in her individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

*ZHP Topics 44 and 47, Princeton Topics 44 and 46, and Solco Topics 20, 44 through 47:*

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

January 28, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Adam M. Slater

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**EXHIBIT A**

**30(B)(6) TOPICS**

***On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:***

*ZHP's Communications with API and Finished Dose Customers and Downstream Customers*

44. ZHP's oral and written communications with ZHP's valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose. **(Together with Minli Zhang)**

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose. **(For Finished Dose, Jie Wang for API)**

*Product Tracing*

51. Tracing of batches and lots of ZHP's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States.

53. The pricing of ZHP's valsartan finished dose that was ultimately sold in the United States.

55. The gross and net profits to ZHP from the sale of ZHP's valsartan finished dose in the United States.

57. The quantity/units of ZHP's valsartan finished dose sold in the United States.

59. The ZHP valsartan finished dose sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days in advance of deposition during the meet and confer process).

***On behalf of Princeton Pharmaceuticals, Inc.:***

*Communications with API and Finished Dose Customers and Downstream Customers*

44. Oral and written communications by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Princeton with their valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP, Huahai US, Inc., Solco, and/or Princeton communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

***On behalf of Solco Healthcare US.:***

*Testing of Valsartan API*

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

*Communications with API and Finished Dose Customers and Downstream Customers*

44. Oral and written communications by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Princeton with their valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose.

45. Oral and written statements (defined to include representations and warranties) by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Princeton to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of ZHP's valsartan API or ZHP's valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP, Huahai US, Inc., Solco, and/or Princeton communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP, Huahai US, Inc., Solco, and/or Princeton in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose.

*Product Tracing*

51. Tracing of batches and lots of ZHP's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States.

53. The pricing of ZHP's valsartan finished dose that was ultimately sold in the United States.

55. The gross and net profits to ZHP, Huahai US, Inc., Solco, and/or Princeton from the sale of ZHP's valsartan finished dose in the United States.

57. The quantity/units of ZHP's valsartan finished dose sold in the United States.

59. The ZHP valsartan finished dose sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Hai Wang.
2. The complete production of Hai Wang's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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